

Presentment Date and Time: September 16, 2014 at 12:00 noon (Prevailing Eastern Time)
Objection Deadline: September 16, 2014 at 11:30 a.m. (Prevailing Eastern Time)

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Jayant W. Tambe
Laura W. Sawyer
I-Heng Hsu

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF PRESENTMENT OF ORDER
SETTING A PRE-EVIDENTIARY HEARING SCHEDULE
REGARDING CLAIMS NUMBER 37355 AND NUMBER 37356**

PLEASE TAKE NOTICE that the undersigned will present the annexed Stipulation, Agreement and Order Regarding Claims Number 37355 and Number 37356 Setting a Pre-evidentiary Hearing Schedule (the “Stipulation”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **September 16, 2014 at 12:00 noon (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Stipulation, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by **September 16, 2014 at 11:30 a.m. (Prevailing Eastern Time)**, the Stipulated Order Setting a Pre-evidentiary Hearing Schedule may be signed.

Dated: September 9, 2014
New York, New York

Respectfully submitted,

/s/ I-Heng Hsu
Jayant W. Tambe
Laura W. Sawyer
I-Heng Hsu
JONES DAY
222 East 41st Street
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.	:	(Jointly Administered)
Debtors.	:	
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**STIPULATION, AGREEMENT AND ORDER REGARDING
CLAIMS NUMBER 37355 AND NUMBER 37356 SETTING A PRE-EVIDENTIARY
HEARING SCHEDULE**

Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator (the “Plan Administrator”) pursuant to the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors* (the “Plan”), and the Washington State Tobacco Settlement Authority (“Washington TSA”) and, together with the Plan Administrator, (the “Parties”), hereby stipulate and agree as follows:

RECITALS

WHEREAS, the Court has scheduled the evidentiary hearing of this action to begin on November 4, 2014 (the “Hearing Date”);

WHEREAS, to assist the orderly and efficient preparation for the evidentiary hearing, the parties desire to establish a pre-evidentiary hearing schedule for certain events;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel of record, and, upon court approval hereof, it shall be ordered that the schedule of pre-evidentiary hearing events in the above-captioned case shall be as follows:

<u>Event</u>	<u>Deadline</u>
Parties exchange witness lists	September 5, 2014
Parties exchange deposition designations	September 12, 2014
Parties exchange proposed exhibit lists and copies of proposed exhibits	September 26, 2014
Parties exchange counter deposition designations	October 3, 2014
Parties exchange proposed uncontested facts	October 3, 2014
Parties object to proposed exhibits	October 10, 2014
Submission to the Court of deposition designations	October 14, 2014
Submission to the Court of Joint Statement of Uncontested Facts	October 14, 2014
Parties agree upon joint exhibits, to the extent possible	October 17, 2014
Submission to the Court of Pre-Hearing Briefs	October 21, 2014
Submission to the Court of Motions in Limine	October 23, 2014
Submission to the Court of Witness Lists	October 27, 2014
Submission to the Court of joint and individual exhibit lists, as well as pre-marked joint and individual exhibits	October 30, 2014
Submission to the Court of Oppositions to the Motions in Limine	October 31, 2014

IT IS HEREBY FURTHER STIPULATED AND AGREED that the deadlines in the preceding schedule shall be for service on opposing counsel of record.

IT IS HEREBY FURTHER STIPULATED AND AGREED that service shall be by
electronic mail, with hardcopy service by hand or overnight delivery for the next business day.

Dated: Seattle, Washington
September 5, 2014

PACIFICA LAW GROUP LLP
By: /s/ Paul J. Lawrence
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Dated: New York, New York
September 5, 2014

RICH MICHAELSON MAGALIFF MOSER, LLP
By: /s/ Eric T. Moser
Eric T. Moser
Robert N. Michaelson
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Attorneys for Washington State Tobacco Settlement Authority

Dated: New York, New York
September 9, 2014

JONES DAY
By: /s/ Laura W. Sawyer
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Attorneys for the Debtors

SO ORDERED:

Dated: New York, New York
September __, 2014

Honorable Shelley C. Chapman
United States Bankruptcy Judge